

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-F and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

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Dated: January 5, 2016

**EXHIBIT A – ANDRUS WAGSTAFF**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-cv-00827	Kathryn Roth, John Roth v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-01950	Nan S. Roberts v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT B – FEARS NACHAWATI**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-cv-13361	Connie Barlow v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C.R. Bard, Inc.

**EXHIBIT C – JOHNSON BECKER**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-25085	Debbie Scheidt, Joseph Scheidt v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT D – LANIER LAW FIRM**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-CV-02156	Rebecca Maree Hoover v. Johnson & Johnson, Ethicon, Inc., American Medical Systems, Inc.
2:12-cv-07239	Linda B. Huber, Vernon R. Huber, Jr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:12-CV-09673	Susanna Sherrill Danielson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:12-CV-09687	Paula Marie Brown, Edward L. Brown v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-00844	Linda L. Sauls v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-07342	Annemarie Nefford v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-10470	Janice Christine Veno, Frank Veno v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-11464	Anna L. Holdren, Eugene A. Holdren v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C. R. Bard, Inc., Tissue Science Laboratories Limited
2:13-CV-11465	Sheila B. Shealy, O. Fouche Shealy v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-17004	Jean E. Gargiulo, Christopher Gargiulo v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-19807	Una Marie Chandler, Fermon Chandler v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT E – WATERS & KRAUS**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-19589	Nell Owens, Waverly Owens v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C. R. Bard, Inc., Tissue Science Laboratories Limited, Coloplast Corp.

**EXHIBIT F – WEXLER WALLACE**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-CV-22714	Carrie L. Foshee v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.



**CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis